

Appl. No. 10/813,409  
Amdt. Dated November 8, 2007  
Reply to Office Action of August 9, 2007

## **REMARKS**

### **Amendments to the claims**

Claims 1 and 15 have been amended to more explicitly and correctly express the present invention.

### **Claim Rejections – 35 USC § 112**

*Claims 6 and 19 are rejected under 35 U.S.C. 112, first paragraph, as based on a disclosure which is not enabling.*

In response, applicant submits that a voltage range between 200 and 900 volts and a power density range of 20 and 60 W/cm<sup>2</sup> are disclosed (specification, p.6, para 0015). Furthermore, applicant also submits that voltage range between 250 and 1000 volts and a power density range of 20 and 70 W/cm<sup>2</sup> have been disclosed (specification, p.6, para 0014).

Therefore, the voltage range of 200 to 1000 volts or 600 to 1000 volts, and the power density range of 20 to 70 W/cm<sup>2</sup> claimed in claims 6 and 19 can be concluded from the disclosure. Reconsideration and withdrawal of the rejection of claims 6 and 19 are respectfully requested.

### **Claim Rejections – 35 USC § 102**

*Claims 1-3, 5, 7, 9, 11, and 15-17 are rejected under 35 U.S.C. §102(b) as being anticipated by Beck et al (US Patent No. 6, 518, 086).*

With regard to claims 1-3, 5, 7, 9, 11, and 15-17:

Amended claim 1 recites, in part:

“A method of manufacturing an electromagnetic interference shield comprising the steps of: ...

(4) applying a voltage to the target module using a power supply, thus sequentially activating a magnetron sputtering process between the respective target modules and the substrate, and thereby sequentially

Appl. No. 10/813,409  
Amdt. Dated November 8, 2007  
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depositing a **first metal layer, a second metal layer, and a third metal layer** from the target modules onto the substrate until a desired thickness is achieved on the substrate.”

In response of this rejection, applicant has amended claim 1, and respectfully submits that Beck et al. does not disclose or suggests that a **first metal layer, a second metal layer and a third metal layer are sequentially deposited from the target modules onto the substrate**, as per amended claim 1.

Beck et al. essentially discloses a method of producing thin-film-based semiconductor devices of group IB-III A-VIA on a substrate in a vacuum for use in photovoltaic applications. The method of Beck et al. includes a stage of depositing a precursor comprising one or more layers onto a substrate. **Each layer of the precursor is formed by co-depositing a group VIA element and a group IB and/or a group III A element**, such that the group VIA and the group IB and/or group III A elements co-exist in the deposited precursor layer. This precursor is then heated to form the semiconductor material. (col. 5, ll. 8-22) Beck et al. further discloses that group VIA elements, suitable for use in the method, include selenium (Se), sulfur (S), and tellurium (Te), which are all nonmetal. (col. 5, ll. 23-32) Therefore, **any layer of the thin-film-based semiconductor of Beck et al. is not formed only of metal, but a combination of a metal (i.e., group IB and III A) and a nonmetal (i.e., group VIA).**

Unlike with the method of Beck et al., the first metal layer, the second metal layer, and the third metal layer of amended claim 1 are all formed of metal. Therefore, amended claim 1 is submitted to be novel and unobvious over Beck et al., and withdrawal of the rejection and

Appl. No. 10/813,409  
Amdt. Dated November 8, 2007  
Reply to Office Action of August 9, 2007

allowance of the claim 1 are respectfully requested.

Claims 2, 3, 5, 7, 9 and 11 depend on claim 1, and should also be allowable, since each includes the patentably distinguishing features of claim 1. Reconsideration and withdrawal of the rejection of claims 2, 3, 5, 7, 9 and 11 are respectfully requested.

Amended Claim 15 recites, in part:

"A method of manufacturing an electromagnetic interference shield comprising the steps of: ...

(3) applying to a voltage to the target module using a power supply, thus sequentially activating a magnetron sputtering process between the respective target modules and the substrate, and thereby sequentially depositing a **first metal layer, a second metal layer, and a third metal layer** from the target modules onto the substrate until a desired thickness is achieved on the substrate."

Similarly to claim 1, applicant has amended the claim 15 and respectfully submits, for the same reasons set forth above, that Beck et al. does not disclose or suggests that target is made from a **first metal layer, a second metal layer and a third metal layer are sequentially deposited from the target modules onto the substrate**, as per amended claim 15. Therefore, the method of amended claim 15 is not taught or suggested by Beck et al. Therefore, the method of amended claim 15 nor the structure yielded by such a method is not taught or suggested by Beck et al., and withdrawal of the rejections and allowance of the claim 15 is respectfully requested.

Claims 16-17 depend on claim 15, and should also be allowable since each includes the patentably distinguishing features of claim 15. Reconsideration and withdrawal of the rejection of claims 16-17 are

Appl. No. 10/813,409  
Amdt. Dated November 8, 2007  
Reply to Office Action of August 9, 2007

respectfully requested.

### **Claim Rejections – 35 USC § 103**

*Claims 4 and 18 are rejected under 35 U.S.C. §103(a) as being unpatentable over Beck et al. as applied to claims 1 and 15 above, further in view of Heeks et al. (US Patent No. 6559593).*

#### **With regard to claims 4 and 18:**

Claims 4 and 18, respectively, depend on claims 1 and 15 and should also be allowable, since each includes the patentably distinguishing features of claims 1 and 15. Reconsideration and withdrawal of the rejection of claims 4 and 18 are respectfully requested.

*Claims 6 and 19 are rejected under 35 U.S.C. §103(a) as being unpatentable over Beck et al. as applied to claims 1 and 15 above, and further in view of Wickersham, Jr. et al. (US Patent No. 7, 087, 142).*

#### **With regard to claims 6 and 19:**

Claims 6 and 19, respectively, depend on claims 1 and 15 and should also be allowable, since each includes the patentably distinguishing features of claims 1 and 15. Reconsideration and withdrawal of the rejection of claims 6 and 19 are respectfully requested.

*Claims 8, 10 and 12-14 are rejected under 35 U.S.C. §103(a) as being unpatentable over Beck et al. as applied to claims 1, 7, and 11 above, and further in view of Kobayashi (Japanese Patent No. 63270452).*

#### **With regard to claims 8, 10 and 12-14:**


Claims 8, 10 and 12-14 depend on claim 1 and should also be

Appl. No. 10/813,409  
Amdt. Dated November 8, 2007  
Reply to Office Action of August 9, 2007

allowable, since each includes the patentably distinguishing features of claim 1. Reconsideration and withdrawal of the rejection of claims 8, 10 and 12-14 are respectfully requested.

In view of the foregoing, the present application as claimed in the pending claims is considered to be in a condition for allowance, and an action to such effect is earnestly solicited.

Respectfully submitted,  
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